

**FILED**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MISSOURI**

**JAN - 7 2008**  
**U. S. DISTRICT COURT**  
**E. DIST. OF MO.**  
**ST. LOUIS**

**JOHN SEBBEN**  
**RECEIVED**  
**BY MAIL**  
**Plaintiff,**  
**JAN 07 2008**

**-vs-** **U. S. DISTRICT COURT**  
**EASTERN DISTRICT OF MO**  
**ST. LOUIS**

**BANK OF AMERICA, N.A.**  
**Serve at: 1000 Samoset Dr.**  
**Wilmington, DE 19713**

**EXPERIAN INFORMATION**  
**SOLUTIONS, INC.**  
**Serve: The Corporation Company**  
**120 So. Central Ave.**  
**Clayton, MO 63105**

**TRANS UNION LLC,**  
**Serve: The Prentice-Hall Corporation**  
**221 Bolivar Street**  
**Jefferson City, MO 65101**

**Defendants.**

**Case No.**

**JURY TRIAL DEMANDED**

**COMPLAINT**

Comes now Plaintiff, John Sebben, and for his causes of action against the defendants, alleges as follows:

1. That Plaintiff, is an adult citizen of the United States and of the State of Missouri. That Plaintiff is a "consumer" and beneficiary of the provisions of the Fair Credit Reporting Act Title 15, Section 1681 U.S.C. et.seq. That this action is brought to enforce liability created by the Fair Credit Reporting Act that arose within two years of the filing of this complaint. This Court has jurisdiction. 15 U.S.C. § 1681p.

2. That Defendant Bank of America is a corporation doing business in the Eastern

District of Missouri and is a "Furnisher" of consumer credit information within the meaning of Title 15, Section 1681s-(2), U.S.C. That Defendants, Experian Information Solutions, Inc. (Hereinafter "Experian") and Trans Union LLC (hereinafter "Trans Union") are entities doing business in the State of Missouri and, doing business in the Eastern District of Missouri, and all are a "consumer reporting agency" within the meaning of Title 15, Section 1681a(f) U.S.C. That hereinafter defendants Experian and Trans Union will be from time to time referred to as "CRA defendants" (for Credit Reporting Agency) when their conduct is the same and parallel.

3. That defendant Bank of America furnished credit information related to plaintiff to the CRA defendants regarding an account that it claimed was owed to it by plaintiff which was not his account. Further, other furnishers furnished information to the CRA defendants that was information about accounts of plaintiff but which contained inaccuracies.

4. That repeatedly, within two years of the filing of this complaint plaintiff disputed the accuracy and completeness of such information to the CRA defendants as those institutions are defined in the Fair Credit Reporting Act who, in turn supplied notice of the disputes, when appropriate, to defendant Bank of America. As a consequence defendant Bank of America was required, pursuant to 15 U.S.C. Sec. 1681s-2(b) to conduct a reasonable investigation and report the results back to the respective CRA defendants. Further, the CRA defendants were obligated pursuant to 15 U.S.C. Sec. 1681i to conduct reasonable investigations of each such dispute.

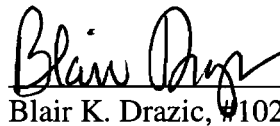
5. That during the period plaintiff was disputing the account with the CRA defendants he also repeatedly disputed the Bank of America account directly with defendant Bank of America, and defendant Bank of America also received notices of plaintiff's disputes from the CRA defendants.

6. That the Defendants all willfully, or alternatively negligently, violated 15 U.S.C. Sec. 1681 s-2(b) or 15 U.S.C. Sec. 1681i as applicable to each defendant in that defendants received numerous disputes from plaintiff that he disputed that the Bank of America account or other accounts or both which information could not be verified yet defendants all failed to conduct a reasonable investigations into plaintiff's disputes that each received and defendant

Bank of America failed to report the results of its so called investigations to the CRA defendants in that defendant failed to report the extent of its limited evidence that plaintiff owed this undocumented loan.

7. That as a direct and proximate result of such violations plaintiff sustained lost credit opportunities, a reduction in the creditworthiness of his reports, and has suffered severe emotional distress which was a real injury and will in the future suffer lost credit opportunities, a reduction in the creditworthiness of his reports, and will suffer severe emotional distress.

WHEREFORE, Plaintiff John Sebben prays judgment against all defendants in such sum as is just and reasonable together with punitive damages, interest, attorney's fees and his costs herein expended.

A handwritten signature in black ink, appearing to read "Blair Drazic", is written over a horizontal line.

Blair K. Drazic, #10208  
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Creve Coeur, MO 63141  
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